

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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|---|---|--------------------------------|
| IN RE: | : | |
| DANIEL N. DICKENSHEETS | : | CASE NO. 1-19-00983-HWV |
| aka DAN N. DICKENSHEETS | : | |
| SHELLY MAE DICKENSHEETS | : | CHAPTER 13 |
| fka SHELLY M. GROFT, fka SHELLY | : | |
| KEENEY, aka SHELLY M. DICKENSHEETS | : | |
| fka SHELLY MAE GROFT | : | |
| Debtors | : | |
| | : | |
| WELLS FARGO BANK, N.A., | : | |
| dba WELLS FARGO AUTO | : | |
| Movant | : | |
| | : | |
| v. | : | |
| | : | |
| DANIEL N. DICKENSHEETS | : | |
| aka DAN N. DICKENSHEETS | : | |
| SHELLY MAE DICKENSHEETS | : | |
| fka SHELLY M. GROFT, fka SHELLY | : | |
| KEENEY, aka SHELLY M. DICKENSHEETS | : | |
| fka SHELLY MAE GROFT | : | |
| Respondents | : | |

**DEBTORS' RESPONSE TO MOTION OF
WELLS FARGO BANK, N.A., d/b/a WELLS FARGO AUTO
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come Debtors, Daniel N. Dickensheets and Shelly Mae Dickensheets, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded.
3. Admitted.
4. Admitted.

5. Admitted in part and denied in part. The Contract speaks for itself. Strict proof is demanded.

6. Admitted in part and denied in part. The Certificate of Title speaks for itself. Strict proof is demanded.

7. Admitted.

8. Admitted.

9. Admitted.

10. Admitted.

11. Admitted in part and denied in part. Debtors question whether they are behind on their post-petition payments. Strict proof is demanded. Specifically, Debtors request a post-petition payment history. To the extent that Debtors are in arrears, once it is determined the amount Debtors are in arrears, they will then make an offer to bring same current.

12. Admitted in part and denied in part. Debtors have no knowledge. Strict proof is demanded.

13. Admitted in part and denied in part. Exhibit "C" speaks for itself. Strict proof is demanded.

14. Admitted in part and denied in part. The vehicle is necessary for an effective reorganization. The vehicle is needed to travel to and from work.

15. Admitted in part and denied in part. Debtors are providing adequate protection through regular post-petition payments. To the extent that the Debtors are in arrears, Debtors will make an offer in the near future to bring same current.

16. Denied. See response to paragraphs 14 and 15.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
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Attorney for Debtors

DATED: 03 / 31 / 2020

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF WELLS FARGO BANK, N.A., d/b/a WELLS FARGO AUTO FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

KARINA VELTER, ESQUIRE
MANLEY DEAS KOCHALSKI LLC
COUNSEL FOR MOVANT
VIA E-SERVICE

IMBLUM LAW OFFICE, P.C.

/s/ Carol V. Shay

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For Debtors

DATED: 3/31/2020